PROPOSED SCOPE OF WORK FOR ICF

REGARDING FUTURE OPERATIONS AND CLIMATE CHANGE UNCERTAINTIES

The BDCP Draft EIR/EIS presented a No Action/No Project Alternative scenario that assumed changed hydrology reflecting the predicted consequences of climate change over the proposed life of the BDCP (i.e., until approximately 2065). The No Action/No Project Alternative did not, however, assume any changes in the existing applicable state or federal regulatory schemes to adapt to those same predicted hydrological consequences during that same time period. Several commenters criticized this approach, contending that the No Action/No Project Alternative was required by CEQA and NEPA to include possible changes in those regulatory schemes.

In response to such comments, the ICF Consultant Team will prepare for the Lead Agencies' consideration a portion of the updated Cumulative Impact Analysis for the Recirculated Draft EIR/Supplement to the Draft EIS presenting the reasoning for the Lead Agencies' decision to assume current operations and current regulations in the modeling for future SWP and CVP operations during the proposed life of the BDCP. The ICF Consultant Team will also provide a description of operational and regulatory uncertainties and possible changes to operations and regulations that could occur in the next 50 years under the No Action/No Project Alternative, the BDCP, and the other action alternatives addressed at length in the EIR/EIS.

The primary objective of this discussion will be to explore and describe the uncertainties and a range of future outcomes that could unfold as California responds to a changing climate. In California, the State Water Resources Control Board, the Central Valley Flood Protection Board, the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and other governmental bodies have regulatory authority over water quality, flood protection, and environmental conditions. These agencies' regulations and policies will have a substantial impact on how California water resources are managed over the next several decades. Projected climate change impacts, including increasing temperatures, loss of snowpack, and rising sea levels, may drive changes to regulations and policies. While there is great uncertainty as to how current regulations and policies will change in the future, this discussion will attempt to explore possible actions by regulatory agencies responding to climate change impacts based on past actions, current regulatory schemes, and leading scientific papers on the subject.

The ICF Consultant Team will include within the document a description of possible operational and regulatory changes that could occur in the future as a result of changes in climate as relevant to the No Action/No Project Alternative, the proposed BDCP, and the other action alternatives set forth in the Draft EIR/EIS. These potential operational and regulatory changes are assumed to relate primarily to SWP/CVP operations that could occur in future years and may be similar for all of the alternatives discussed by the Consultant Team. In recognition of the uncertainties regarding the specific impacts of climate change during the time period in question, the discussion prepared by ICF will consider a range of climate change impacts on temperature and precipitation drawn from the climate change projections described in BDCP EIR/EIS Appendix 5A. For the purposes of exploration, this discussion will consider a range of climate change impacts that includes both wetter and drier conditions, moderate and extreme increases in temperature, and moderate as well as extreme increases in sea level. ICF's discussion will begin by summarizing the discussion from the DEIR/S and will include an acknowledgement of the uncertainties inherent in trying to predict what the future could look like in 50 years, with respect to

how climate change could actually unfold, how regulations and policies to protect aquatic species and water quality could evolve, how water infrastructure and use could change, and the manner in which DWR, Reclamation, and other agencies could respond over time to changing conditions. Drawing from existing scientific studies and other documents on which the Lead Agencies have relied in predicting future hydrological changes, the discussion will include a general description of the types of impacts that could occur under the various climate change outcomes, such as potential impacts on fish and wildlife, reservoir storage and flood control changes, water supply implications, increased Delta outflows, and water transfers. The ICF Consultant Team will also discuss how the comprehensive review(s) of the BDCP[1] could provide an opportunity for the Adaptive Management Team to further refine project operations within the parameters of the BDCP in light of precipitation trends that have emerged by that time.

The ICF Consultant Team will also discuss how implementation of the California Water Action Plan by various agencies may affect future responses to sea-level rise and other aspects of climate change (e.g., alteration in precipitation patterns). Work done by other agencies on climate change, such as IPCC reports, will be reviewed to identify appropriate descriptions of future conditions and possible responses by institutions, organizations, and communities to these conditions. ICF shall also consider policy changes or other actions under consideration by affected local water agencies.

In preparing this new discussion, the ICF Consultant Team will work with climate change and operations specialists at DWR, Reclamation, and the Public Water Agencies. The Consultant Team may also reach out to staff from other agencies in order to get those agencies' views on how they might alter their programs or regulatory approaches to respond to changing conditions.

[1] The BDCP currently proposes periodic 5-year reviews. A 25-year check-in review has also been suggested but that has not been agreed to by all parties.